

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

NORMA CAMPOS,

Plaintiff,

v.

**TOLTECA ENTERPRISES, INC.;
PHOENIX RECOVERY GROUP; and
DOE 1-5**

Defendants.

**Civil Action No. SA-14-CV-0874-RP
(consolidated with 5:15-CV-045-RP)**

**DECLARATION OF ROBERT AMADOR IN SUPPORT OF PLAINTIFF'S MOTION
FOR ADDITIONAL ATTORNEY'S FEES**

I, Robert Amador, declare:

1. I am counsel of record for Plaintiff Norma Campos in the above captioned case. I submit this Declaration in support of Plaintiff's Motion for Summary Judgment.
2. I practice almost exclusively representing plaintiffs in Fair Debt Collection Practices Act cases.
3. I am an attorney in good standing with the California State Bar. I am also a member of the federal bars for the U.S. District Court for Colorado, the U.S. District Court for the Eastern District of Michigan, the U.S. District Court for the Western District of Michigan, the U.S. District Court for the Northern District of Florida, the U.S. District Court for the Western District of New York, the U.S. District Court for the Central District of California, the U.S. District Court for the Eastern District of California, the U.S. District Court for the Northern District of

California, the U.S. District Court for the Central District of Illinois, and the U.S. District Court for the Western District of Texas.

4. My firm, Centennial Law Offices, represents plaintiffs in Fair Debt Collection Practices Act cases in federal jurisdictions throughout the country. I have represented consumers in Fair Debt Collection Practices Act cases in various California state courts and have appeared as attorney of record in over 30 U.S District Courts across the country. I have represented hundreds of clients in Fair Debt Collection Practices Act matters.

5. My normal billing rate for all services and matters, including those services rendered in the instant case, is \$300.00 per hour. Plaintiff's fee agreement contains a billing rate of \$300.00 per hour.

6. In Fair Debt Collection Practices Act cases as well as in all other matters, I bill at a rate of \$300.00 per hour. Paralegal/staff time is billed at a rate of \$50.00 per hour.

7. The "Billing File for Campos v. Tolteca Enterprises, Inc et al." (Exhibit A to Plaintiff's current motion) is true and correct to the best of my knowledge.

8. On September 19, 2014 I mailed a pre-litigation demand letter to Defendant Telteca Enterprises dba Phoenix Recovery Group ("Defendant"). I advised Defendant that Ms. Campos was entitled to up to \$1,000 in statutory damages plus her legal fees, which I disclosed as \$955.00 as of that time. On September 25, 2014, I received a fax from Defendant's counsel Thomas Clark acknowledging receipt of my letter.

9. A settlement not having been reached, this lawsuit was filed on October 3, 2014. After the lawsuit was filed, Defendant's counsel and I engaged in lengthy settlement discussions culminating in Plaintiff's offer to settle for a total of \$2,992.41. Defendant did not accept the offer.

10. Pursuant to the Court's Scheduling Order, Plaintiff made an offer of settlement on March 9, 2015 for \$4,832.41 inclusive of her legal fees and costs. Defendant promptly rejected the offer on March 10, 2015 without making a counteroffer.

11. On October 2, 2015, Defendant offered \$4,000.00, inclusive of statutory damages, legal fees, and costs. Plaintiff rejected the offer.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of October 2015 in Ventura, California.

Respectfully submitted,

s/ Robert Amador

ROBERT AMADOR, ESQ.

Attorney for Plaintiff NORMA CAMPOS

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